

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
OCEAN LINE HOLDINGS LIMITED	:
	:
Plaintiff,	:
	:
- against -	:
	:
CHINA NATIONAL CHARTERING	:
CORP. a/k/a SINOCHART, :	:
	:
Defendant.	:
-----X	

07 Civ. 8123

[ ]

**DECLARATION OF XING NAI QUN  
IN SUPPORT OF DEFENDANT'S  
MOTION TO VACATE MARITIME ATTACHMENT**

I, XING NAI QUN declares under penalty of perjury of the laws of the United States of America as follows:-

1. I am the Manager of the Legal Department of China National Chartering Corp. ("Sinochart") and I make this Declaration based upon my own personal knowledge and upon documents that I believe to be true and accurate.
2. I submit this Declaration in Support of Sinochart's application seeking to vacate the maritime attachment of Sinochart's assets in this lawsuit.
3. Sinochart was formed in 1955 by Chinese Government. A copy of Sinochart's recent Business License issued by the State Administration for Industry and Commerce of the People's Republic of China (the Chinese government) together with its English translation is exhibited as "Exhibit 1".

4. As reflected in Sinochart's Business License, its "economic nature" is as a state owned company with "ownership by the entire people," which under Chinese law means the company is owned by the People's Republic of China. (*See Exhibit "1" attached hereto*).

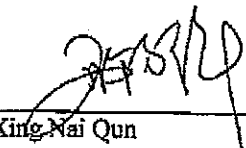
5. I can attest that Sinochart is a separate legal corporation created under the laws of the People's Republic of China and is neither a citizen of a State of the United States nor was it created under the laws of any third country.

6. Sinochart is engaged in the shipping industry as agents, charterers, managers and operators of ocean going vessels and other functions related to the industry generally.

7. Sinochart is suffering a severe impact by virtue of the restraint of its funds and is in jeopardy of defaulting on numerous contractual obligations to pay funds to third parties, which will have the additional injurious effect of harming Sinochart's reputation in the shipping industry.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on 16th October, 2007 in Beijing, China.

  
\_\_\_\_\_  
Xing Nai Qun

**AFFIRMATION OF SERVICE**

I hereby certify that on September 18, 2007, a copy of the foregoing Declaration of Xing Nai Qun was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

A handwritten signature in black ink, appearing to read "Patrick F. Lennon", written over a horizontal line.

Patrick F. Lennon